

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ROBERT FRANCIS LOPEZ ACEVEDO

DEBTOR

CASE NO. 14-02177-MCF

CHAPTER 13

**DEBTOR'S REPLY TO *MOTION TO DISMISS*
FILED BY SCOTIABANK PUERTO RICO DOCKET #58**

TO THE HONORABLE COURT:

COMES NOW, ROBERT FRANCIS LOPEZ ACEVEDO, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On June 22, 2015, Scotiabank Puerto de Rico ("Scotiabank") filed a *Motion to Dismiss*, docket #58, basically alleging that the debtor is in arrears in three (3) post-petition mortgage loan payments to Scotiabank.

2. The debtor met with the undersigned attorney regarding this matter and respectfully submits that he did incur in post-petition arrears with Scotiabank due to certain economic problems.

3. The debtor respectfully submits that he is up to date in his mortgage loan payments with Scotiabank. On June 16, 2015, he made three (3) \$768.00 payments, for a total sum of \$2,304.00, in order to cure the arrears owed to Scotiabank. Attached is evidence of the payments made by the debtor to Scotiabank.

WHEREFORE, debtor respectfully requests this Honorable Court Order deny the *Motion to Dismiss* filed by Scotiabank, docket #58.

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Debtor's Reply to Motion to Dismiss
Case no. 14-02177-MCF13

I **CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to: the Chapter 13 Trustee; Jose F. Cardona Jimenez, Esq., Counsel for Scotiabank; I also certify that a copy of this motion was sent via US Mail to Robert Francis Lope Acevedo, debtor in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 23rd day of June, 2015.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USBC #203614
ATTORNEY FOR PETITIONERS
PO BOX 186 CAGUAS PR 00726
TEL 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

DATE PMT. NO.

SCOTIABANK DE F.R.
60715
RECEIPT
JUN 16 2015
TELLER
Sug. Hato Pay
CURRENT
600040060
ADIT. NO.

DATE

2,304.00
AMT.

CUSTOMER

Scotiabank

Transaction Record

06/16/2015 P: 1
Scotiabank Transit : 60715
ID: 201506160000303 Teller Number: 006
PIN: N

HORIZON MORTGAGE PAYMENT USD
63545/600040060
HZ FHA

Standard Payment Received	\$2,205.00
Late Fees Payment	\$99.00
Cheque	\$2,304.00

TRANSACTION AMOUNT	\$2,304.00
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Valid Money Order includes: 1. Heat sensitive, red stop sign AND 2. Contains a True Watermark hold up to light to view.

MoneyGram.

INTERNATIONAL MONEY ORDER

06/15/15

To Validate: Touch the stop sign, then watch it fade and reappear

10678433865
MONEY ORDER

PAY EXACTLY **SEVEN HUNDRED **
SIXTY-EIGHT ***
DOLLARS 00 CENTS

PAY TO THE ORDER OF / PAGAR A LA ORDEN DE: Scotia Bank

IMPORTANT - SEE BACK BEFORE CASHING

PURCHASER, SIGNER FOR DRAWER / COMPRADOR, FIRMA DEL LIBRADOR: Robert F. Lopez Nieves

ADDRESS / DIRECCION: Calle Olvera 40060

Payable Through Citizens Alliance Bank, Clara City, MN

ISSUER/DRAWER: MONEYGRAM PAYMENT SYSTEMS, INC.

966431060330603
2295822166125865

MONEY ORDER NUMBER: R106784338650

CALL 1-800-542-3590 TO VERIFY

109191518701067 84338650 90

MoneyGram.

RECEIPT

Scotiabank April 15

10678433865
125 YN
\$768.00

06/15/15

966431060330603

EMPLOYEE: 22

716 (212) 7001400

KEEP A COPY OF THIS STUB FOR YOUR RECORDS / MANTENGA UNA COPIA DE ESTE RECIBO PARA SUS ARCHIVOS

Valid Money Order includes: 1. Heat sensitive, red stop sign AND 2. Contains a True Watermark hold up to light to view.

MoneyGram.

INTERNATIONAL MONEY ORDER

06/15/15

To Validate: Touch the stop sign, then watch it fade and reappear

10678433866
MONEY ORDER

PAY EXACTLY **SEVEN HUNDRED **
SIXTY-EIGHT ***
DOLLARS 00 CENTS

PAY TO THE ORDER OF / PAGAR A LA ORDEN DE: Scotia Bank

IMPORTANT - SEE BACK BEFORE CASHING

PURCHASER, SIGNER FOR DRAWER / COMPRADOR, FIRMA DEL LIBRADOR: Robert F. Lopez Nieves

ADDRESS / DIRECCION: Calle Olvera 40060

Payable Through Citizens Alliance Bank, Clara City, MN

ISSUER/DRAWER: MONEYGRAM PAYMENT SYSTEMS, INC.

966431060330603
2295822166125866

MONEY ORDER NUMBER: R106784338661

CALL 1-800-542-3590 TO VERIFY

109191518701067 84338661 90

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RECEIPT

Scotiabank May 15

10678433866
125 YN
\$768.00

06/15/15

966431060330603

EMPLOYEE: 22

716 (212) 7001400

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MoneyGram.

INTERNATIONAL MONEY ORDER

06/15/15

To Validate: Touch the stop sign, then watch it fade and reappear

10678433867
MONEY ORDER

PAY EXACTLY **SEVEN HUNDRED **
SIXTY-EIGHT ***
DOLLARS 00 CENTS

PAY TO THE ORDER OF / PAGAR A LA ORDEN DE: Scotia Bank

IMPORTANT - SEE BACK BEFORE CASHING

PURCHASER, SIGNER FOR DRAWER / COMPRADOR, FIRMA DEL LIBRADOR: Robert F. Lopez Nieves

ADDRESS / DIRECCION: Calle Olvera 40060

Payable Through Citizens Alliance Bank, Clara City, MN

ISSUER/DRAWER: MONEYGRAM PAYMENT SYSTEMS, INC.

966431060330603
2295822166125867

MONEY ORDER NUMBER: R106784338672

CALL 1-800-542-3590 TO VERIFY

109191518701067 84338672 90

MoneyGram.

RECEIPT

Scotiabank May 15

10678433867
125 YN
\$768.00

06/15/15

966431060330603

EMPLOYEE: 22

716 (212) 7001400

KEEP A COPY OF THIS STUB FOR YOUR RECORDS / MANTENGA UNA COPIA DE ESTE RECIBO PARA SUS ARCHIVOS